

EXHIBIT 94

[Page 1]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

PEGGY ROIF ROTSTAIN,)	
Et al., on Behalf of)	
themselves and all others)	
similar situated,)	
Plaintiffs,)	
)	
and)	
)	
THE OFFICIAL STANFORD)	
INVESTORS COMMITTEE,)	CASE NO.
Plaintiff-Intervenor,)	3:09-CV-02384-N
)	
-against-)	
)	
TRUSTMARK NATIONAL BANK,)	
HSBC BANK PLC, THE)	
TORONTO-DOMINION BANK,)	
INDEPENDENT BANK f/k/a)	
BANK OF HOUSTON, SG)	
PRIVATE BANKING (SUISSE))	
S.A., and BLAISE FRIEDLI,)	
Defendants.)	

ORAL AND VIDEOTAPED DEPOSITION OF
DIANA SUAREZ
August 28, 2015
VOLUME 2

A P P E A R A N C E S

FOR THE PLAINTIFFS:

James R. Swanson, Esq.
Benjamin D. Reichard, Esq.
FISHMAN HAYGOOD, LLP
201 St. Charles Avenue, Suite 4600
New Orleans, LA 70170
504.586.5252
jswanson@fishmanhaygood.com
Breichard@fishmanhaygood.com

FOR THE DEFENDANT THE TORONTO-DOMINION BANK:

Kavitha Sivashanker, Esq.
SIMPSON THACHER & BARTLETT, LLP
425 Lexington Avenue
New York, NY 10017
212.455.2197
kavitha.sivashanker@stblaw.com

FOR THE DEFENDANT THE TORONTO-DOMINION BANK:

Rodney Acker, Esq.
Ellen Sessions, Esq.
NORTON ROSE FULBRIGHT US LLP
2200 Ross Avenue, Suite 3600
Dallas, TX 75201
214.855.8000
rodney.acker@nortonrosefulbright.com
ellen.sessions@nortonrosefulbright.com

FOR THE DEFENDANT INDEPENDENT BANK SUCCESSOR
BY MERGER TO BANK OF HOUSTON:

Brad Repass, Esq.
HAYNIE RAKE REPASS & KLIMKO, P.C.
Wellington Centre
14643 Dallas Parkway, Suite 550
Dallas, TX 75254
972.716.1855
brad@hrrpc.com

1 FOR THE DEFENDANT HSBC BANK PLC:

2 Taylor F. Brinkman, Esq.

LOCKE LORD, LLP

3 2200 Ross Avenue, Suite 2200

Dallas, TX 75201

4 214.740.8000

tbrinkman@lockelord.com

5

6 FOR THE DEFENDANT TRUSTMARK NATIONAL BANK:

7 Ashley Kleber, Esq.

GIBBS & BRUNS LLP

8 1100 Louisiana, Suite 5300

Houston, TX 77002

9 713.650.8805

akleber@gibbsbruns.com

10

11 FOR THE DEFENDANT BLAISE FRIEDLI:

12 Stephanie Gamiz, Esq.

MORGAN LEWIS & BOCKIUS, LLP

13 101 Park Avenue

New York, NY 10178-0060

14 212.309.6202

sgamiz@morganlewis.com

15

16 FOR THE DEFENDANT SOCIÉTÉ GÉNÉRALE PRIVATE
BANKING (SUISSE) S.A.:

17 Wallis Hampton, Esq.

SKADDEN, ARPS, SLATE, MEAGHER & FLOM, LLP

18 1000 Louisiana Street, Suite 6800

Houston, TX 77002

19 713.655.5122

wallis.hampton@skadden.com

20

21 ALSO PRESENT:

22 Rebecca Carter, Videographer

Marilyn Reitta, Interpreter

23

24

25

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1 Q. And after your last deposition, did you search
2 for any additional documents relating to Stanford in
3 connection with this case?

4 A. No. After -- after the -- my Yahoo! account
5 was recovered, and I gave my lawyers, you know, the --
6 the e-mails, I haven't done anything.

7 Q. And did you give those e-mails before or after
8 July 1st, when you were deposed?

9 A. Just the day before.

10 Q. Day before.

11 And did you look for any documents in
12 e-mail account labeled aaaa@bbbb.com at any point after
13 your deposition?

14 A. Oh, no.

15 Q. Did you look for e-mails in that account before
16 your deposition?

17 A. You mean --

18 Q. Before your July 1st deposition.

19 A. No.

20 Q. And does this e-mail account contain any
21 e-mails you think relevant to this action?

22 A. No.

23 Q. Do you recall testifying in your last
24 deposition that this e-mail account may have had
25 relevant e-mails?

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1 used it with my Yahoo! account always joint together.

2 Q. And when you say they were joined together, do
3 you mean all of the e-mails in the bbbb.com account or
4 in your Yahoo! account?

5 A. Yes.

6 Q. And there would be -- or would there be any
7 documents or e-mails in your bbbb.com account that are
8 not in your Yahoo! account?

9 A. No.

10 MR. SWANSON: Actually, I think Van, who
11 is not here, but he probably will be later. We looked
12 into that at some point. I wish I could tell you what,
13 but I don't know. He does know, so when he gets here,
14 maybe we can get you a little more information on what
15 we did to be sure that there was nothing that was
16 relevant that was in a different account.

17 MS. SIVASHANKER: Great. Thank you.

18 MR. SWANSON: Yeah.

19 Q. (By Ms. Sivashanker) And going back to --
20 after your July 1st deposition, did you look for -- I
21 know you mentioned that you produced e-mails from your
22 Yahoo! account the night before the deposition.

23 Did you provide any other documents to
24 your counsel after the deposition?

25 A. No.

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1 it have to be after -- after the -- the fraud, because I
2 was always willing to pay taxes and I wanted all my --
3 my -- my papers and my -- to be correct, to be -- so I
4 didn't know.

5 Q. So you think you gained an understanding of
6 this term sometime after February 2009?

7 A. Yeah.

8 Q. But you didn't understand this term before that
9 date?

10 A. No.

11 Q. And Ms. Suarez, you mentioned the tax returns.

12 Did you file -- when you filed your tax
13 returns, did you report the interest that you earned on
14 your Stanford CD investments on your tax returns?

15 A. Okay. All the -- all the information that I
16 have for my accounts and the interest rates and what I
17 was gaining from the accounts, I gave everything to my
18 husband. He was the one -- they were married the day he
19 died. I -- he did all the -- the taxes, and I never
20 really knew what was going on or anything.

21 Q. So you don't know if you reported the interest
22 earned on your Stanford CDs on those tax returns?

23 A. When I was looking at the tax returns, yes, we
24 did two years, I think. And then in the 2007 for -- I
25 don't know what reasons he didn't do it.

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1 Q. Sorry. Just to make sure I understand.

2 So you said for two years, he --

3 A. I think. I'm not sure.

4 Q. And for two years, he did the tax returns or
5 you did the tax returns?

6 A. No. He did the tax returns all the time.

7 Q. And what were those two years that he did the
8 tax returns?

9 MR. SWANSON: Object to the form. She
10 said he did the tax returns on all the years. You just
11 said two years.

12 A. Since we marry in 1972.

13 Q. (By Ms. Sivashanker) So just to make sure I
14 understand, you mentioned two years. You don't know why
15 he didn't do it.

16 What were you referencing there for the
17 two years?

18 A. Oh, two years? Did I say that? I'm sorry.
19 But I should use the translator.

20 (Through interpreter) Wait. My husband
21 did the taxes ever since we got married in 1972, 1971,
22 until the day he died in 2014. Going back and reviewing
23 the tax documents over these last years regarding to --
24 regarding the interest accrued, I saw that in the year
25 2007, the interest was not declared. I spoke about this

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1 with my son, Gabriel. My husband had already died, and
2 we believe that it was the accounting firm were the ones
3 that did not declare those taxes. We don't know why.
4 That's it.

5 Q. To make sure I understand, so in 2007, the
6 interest was not declared on the tax returns, correct?

7 A. Correct.

8 Q. And were there any other years, other than
9 2007, where the interest from the Stanford investments
10 was not declared on the tax returns?

11 A. I couldn't find any of that in the -- in the
12 tax returns, so I don't know.

13 Q. And when you say you couldn't find any of that,
14 you didn't see the interest reported in any of the other
15 tax returns?

16 A. The only tax returns that I didn't see the
17 interest report was in 2007. We didn't pay anything for
18 the -- I don't know if that's the way -- this is the
19 first year that I'm doing my taxes here in the states by
20 myself now that I'm a widow, so I'm getting used to all
21 the -- the tax returns and everything.

22 Q. When did you start doing the taxes on your own?

23 A. Last -- this year, 2000 --

24 Q. '15?

25 A. No, '15.

1 Q. So in '14 --

2 A. Yeah, I did.

3 Q. So in 2014, you started doing your own tax
4 returns?

5 A. Yeah. When my -- my husband died.

6 Q. And you had mentioned or previously testified
7 about an accounting firm preparing the tax returns
8 previously.

9 Which accounting firm was this?

10 A. Oh, I don't remember the name right now.

11 Q. Do you know where the accounting firm is
12 located?

13 A. It's located in Miami, but I don't remember the
14 name.

15 Q. And so this was the firm that worked with you
16 for the US tax returns or worked with your husband?

17 A. With my husband for awhile.

18 Q. Were any other accounting firms used?

19 A. I don't really know. Like I say before, he was
20 the one that took care of all the financial things in
21 our family.

22 Q. Have you filed any amended tax returns for
23 2007?

24 A. I don't know what you're talking about.

25 Q. So you previously just testified that you

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1 learned that the interest for your Stanford CD
2 investments were not declared on your 2007 tax returns,
3 correct?

4 A. Correct.

5 Q. Did you file an amendment once you learned
6 about information -- or I'm sorry.

7 Once you learned that information, did you
8 file an amended tax return for 2007?

9 A. Okay. What I did is, the past two years, I
10 went to H&R Block and I gave all the information they
11 wanted and they did my taxes, and I pay what I had to
12 pay.

13 Q. And did H&R Block file an amended tax returns
14 for prior years?

15 A. I don't know. I have to go and see the files.

16 Q. You're not aware if they filed?

17 A. I don't know.

18 Q. And did you ask them to file an amended return,
19 if anything?

20 A. I gave all -- I told them about all these
21 problems and I gave them all the information they
22 needed.

23 Q. And did you mention to them that you were aware
24 that the interest had not been declared on your 2007 tax
25 return for your Stanford investment?

1 A. Yes, I did.

2 (Exhibit 142 was marked.)

3 Q. (By Ms. Sivashanker) Ms. Suarez, I'm going to
4 give you what's been marked as Exhibit 142. This is an
5 e-mail that, again, has a Spanish version in front with
6 the English translation behind it with a certificate of
7 accuracy behind that.

8 If you look at the English translation, it
9 is Bates-numbered SUAREZ_685 to SUAREZ_686. It is an
10 e-mail chain and the top e-mail is from Diana Suarez to
11 Maria Villanueva, dated July 28, 2008.

12 Ms. Suarez, if you're looking at this
13 e-mail, again, the bottom Bates number is 685.

14 Do you recognize this e-mail?

15 A. Yes, I do.

16 Q. And if you look at the very bottom e-mail,
17 again, on the right-hand side on the bottom page, it's
18 685, so it's the very bottom e-mail on that page.

19 Do you see that there's an e-mail from
20 Diana Suarez to, again, AA.

21 Do you see that?

22 A. Yes.

23 Q. And if you look at that e-mail, you write: I
24 would like to get information about the procedure to be
25 followed to make a withdrawal from my REDACTED ,

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1 before its maturity in September 2008 without penalties.

2 That is what amount can be withdrawn and transferred

3 into my Bank of America account.

4 Do you see that language?

5 A. Yes, I do.

6 Q. Why were you asking about information about how
7 to make a withdrawal here?

8 A. Because my husband had a nervous breakdown and
9 we needed the money for his -- his problem.

10 Q. And you were trying to transfer this amount for
11 your husband, Juan, correct?

12 A. Yes.

13 Q. Into your Bank of America account, correct?

14 A. Yes.

15 Q. And then were you hoping to transfer that
16 amount from Bank of America -- your Bank of America to
17 Juan afterwards?

18 A. Yes.

19 Q. And in the next e-mail, you'll see, again, on
20 the bottom right-hand page, it's 685, if you stay on the
21 685 page. In the very middle, there's an e-mail from
22 Maria Villanueva to REDACTED.

23 Do you see that e-mail?

24 A. The one in the middle, yeah.

25 Q. And is this your Yahoo! e-mail address?

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1 A. Yes.

2 Q. And Maria writes: You can withdraw 25 percent
3 of the amount in the flex during the term of your
4 certificate. That means that if the term is one year,
5 you can withdraw up to 25 percent without penalty in
6 that year.

7 Do you see that language?

8 A. Yes.

9 Q. Was this the first time that you had asked
10 Maria about making a withdrawal from your Stanford flex
11 account?

12 A. I think so.

13 Q. And had you made -- and in terms of this
14 amount, this would be a withdrawal that you were asking
15 about -- a withdrawal of principal, correct, from your
16 Stanford account?

17 A. Yes.

18 Q. And do you recall previously testifying that
19 the only withdrawals that you made from your account
20 were monthly interest withdrawals and no other amounts?

21 A. Yes, I testified that.

22 Q. But you agree that this amount that you were
23 seeking to withdraw was a withdrawal of principal,
24 correct?

25 A. Yes.

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1 Q. And if I look again at the very top e-mail on
2 the bottom right-hand page of 685, you'll see it's an
3 e-mail from you, Diana Suarez to Maria Villanueva,
4 correct?

5 It's the very top e-mail on this page.

6 A. In the --

7 Q. It's the page Bates-numbered on the right, 685.

8 A. Okay.

9 Q. And in this e-mail, she writes: The amount to
10 be withdrawn from the REDACTED and
11 deposited into my Bank of America REDACTED
12 REDACTED, correct?

13 A. Correct.

14 Q. And this is REDACTED, correct?

15 A. Yes. Correct.

16 Q. And so this REDACTED withdrawal was being
17 made for Juan, your husband, correct?

18 A. Yes.

19 Q. And would you agree that since this was a
20 withdrawal of principal, that your prior testimony, that
21 the only withdrawals you had made from your Stanford
22 account was interest was inaccurate?

23 A. Yes. I -- I can say that, but I'm going to --
24 I didn't remember --

25 Q. But you would agree that --

1 A. -- the withdrawal.

2 Q. But you would agree the prior testimony was not
3 accurate?

4 A. Yes.

5 (Exhibit 143 was marked.)

6 Q. (By Ms. Sivashanker) Ms. Suarez, I'm going to
7 give you what's now been marked as Exhibit 143. Again,
8 this is a set of -- this is an e-mail chain where there
9 is a Spanish language version in the front and the
10 English language behind it that's been translated with a
11 certificate of accuracy behind that.

12 This e-mail chain, the top e-mail is from
13 Diana Suarez to Maria Villanueva. It's dated August 7,
14 2008, and it's Bates-numbered SUAREZ_726 through
15 SUAREZ_730.

16 Ms. Suarez, do you remember this e-mail?

17 A. Yes, I do.

18 Q. And what does it generally discuss?

19 A. I'm asking Maria about the transfer because he
20 is really in -- he's having problems and he needed the
21 money and I wanted her to tell me what happened to the
22 transfer so I could answer Juan, and I said: Appears to
23 me that it is very urgent. And I was being polite in
24 saying that I -- thank you very much for -- for all your
25 job. I mean, everything you're doing.

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1 Q. And previously, you had testified that you did
2 not have a certificate -- original certificate for the
3 September 6th, 2006 CD.

4 Do you recall that?

5 A. September 6th, 2000 --

6 Q. -- 6.

7 A. Uh-huh, yes.

8 Q. Did you have that certificate at the time of
9 this e-mail in May 25th, 2009?

10 A. I was missing one and I don't remember which
11 one was it.

12 Q. So even on May 25th, 2009, you were missing one
13 certificate?

14 A. Yes.

15 (Exhibit 150 was marked.)

16 Q. (By Ms. Sivashanker) Ms. Suarez, I'm going to
17 hand you what's been marked as Exhibit 150. This is an
18 e-mail. It is dated March 12th, 2013. It is an e-mail
19 chain, the top e-mail is dated March 12, 2013. It's
20 from Gabriel Suarez to stanfordclaims.support@uk.tt.com
21 and it copies Diana Suarez. It is Bates-numbered
22 SUAREZ_001248 to SUAREZ_001250.

23 Ms. Suarez, do you recognize this
24 document?

25 A. Yes.

1 Q. And can you tell us generally what this
2 document is?

3 A. This document, exactly what it says here, proof
4 of debt to claim form.

5 Q. So this is the proof of debt claim form that
6 was submitted to the joint liquidators, correct?

7 A. Exactly.

8 Q. And do you know why this document was not
9 produced to us prior to your last deposition?

10 A. This -- this wasn't? I didn't know. No.
11 Maybe because it wasn't in -- in the Yahoo! account, I
12 have the -- the copy.

13 Q. And were additional e-mails collected from your
14 Yahoo! account after your last deposition?

15 A. No. No.

16 MR. SWANSON: I think if you'd been at the
17 last deposition, you'd know that we didn't produce all
18 the e-mails before the last deposition, so this is
19 probably one of the many that wasn't produced because we
20 got them the day before.

21 MS. SIVASHANKER: Okay.

22 Q. (By Ms. Sivashanker) And, Ms. Suarez, if you
23 look at the bottom e-mail on Page 1248, you'll see it's
24 from Stanford claim support, and it's signed by the
25 joint liquidators, Marcus Wide and Hugh Dickson. And it

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1 writes: Dear sir/madam, we acknowledge your proof of
2 debt claim form. However, please note that all four
3 signatures presented does not match the specimen in our
4 records.

5 Do you see that language?

6 A. Yes, I do.

7 Q. And if you look at the e-mail right above it
8 from Gabriel Suarez copying you to Stanford claim
9 support, it writes: Attached is the requested
10 signature page for the proof of debt. The quality of
11 the documents is somewhat reduced because of the
12 scanning.

13 Do you see that language?

14 A. Yes.

15 Q. And on this e-mail, your son, Gabriel Suarez,
16 is listed as a sender, correct?

17 A. Yes.

18 Q. And if you turn to the next page of the
19 document, the attachment, which is Bates-numbered 1250,
20 the attachment is a signature page, correct?

21 A. Yes.

22 Q. And is this your signature on this document?

23 A. Yes.

24 Q. And did you print your name on this page?

25 A. Yes.

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1 Q. And did you -- did you date this document
2 March 11, 2013?

3 A. Yes.

4 Q. And are these -- is this a signature of your
5 son, Eduardo Suarez?

6 A. I think so.

7 Q. And is this a signature of your son, Daniel
8 Suarez?

9 A. I think so.

10 Q. And is this your signature of your son, Gabriel
11 Suarez?

12 A. Yes, I think so, uh-huh.

13 Q. Do you recall in your prior deposition
14 testifying that you had signed the proof of debt form
15 submitted in February of 2013?

16 A. Could you please --

17 Q. In your prior deposition --

18 A. You're speaking too fast.

19 Q. I'll try to slow down for you.

20 In your prior deposition, do you recall
21 previously testifying that you had signed the proof of
22 debt form to the joint liquidators which was submitted
23 in February of 2013?

24 A. Yes.

25 Q. Now, seeing this e-mail from the joint

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1 liquidators discussing how the signatures presented did
2 not match their records, do you agree now that you did
3 not sign the February 2013 form that was submitted to
4 the joint liquidators?

5 A. Yes.

6 Q. So you would agree that your prior testimony
7 that you had signed the February 2013 form to the joint
8 liquidators was not correct?

9 A. Yes.

10 Q. And do you know what signature the joint
11 liquidators had on file for you that did not match the
12 signatures provided?

13 A. No, I don't know.

14 Q. And in addition to the proof of debt claim
15 form, have you submitted any other documents to the
16 joint liquidators?

17 A. I don't remember.

18 Q. And were there any other communications that
19 you recall after this communication from the joint
20 liquidators regarding issues provided by signatures by
21 you?

22 A. I don't remember. And by this time, I gave all
23 the power to my son, Gabriel. I gave him the power of
24 attorney and everything, so he could act in my behalf.

25 Q. And you mentioned this power of attorney.

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1 When did you give the power of attorney to
2 your son, Gabriel Suarez?

3 A. Oh, my God. I have to remember when I did
4 that. It was -- I don't remember exactly the date. It
5 was one of my trips to Miami.

6 Q. And do you recall if it was after March of
7 2013?

8 A. I don't recall.

9 Q. And what did the power of attorney provide
10 Gabriel with the power to do?

11 A. To do everything that have to be done in my
12 behalf.

13 Q. And you say everything that had to be done on
14 your behalf. Did that include everything relating to
15 your Stanford investments?

16 A. Everything.

17 Q. And has that power of attorney, is it still in
18 operation right -- today?

19 A. Yes.

20 Q. But you don't recall when you first gave it to
21 Gabriel Suarez?

22 A. No, not exactly the date.

23 Q. And do you know if you provided a copy of that
24 power of attorney to your counsel?

25 A. No, I didn't.

1 A. Yes.

2 Q. And then below that, you see REDACTED

3 REDACTED, correct?

4 A. Yes, correct.

5 Q. And you had previously testified that your --
6 that this was the account for your express account,
7 correct?

8 A. Correct.

9 Q. And if you look right below that after that,
10 you see another account number listed towards the bottom
11 of the page, which is 1171. It's REDACTED,
12 correct?

13 A. Correct.

14 Q. And the REDACTED, this was for the first
15 CD that was issued to you on March 6, 2006, correct?

16 A. Correct.

17 Q. And this was the flex CD account, correct?

18 A. Right.

19 Q. If you turn to the next page -- actually,
20 sorry.

21 If you stay on Page 1171, you will see
22 that underneath the REDACTED, there's three
23 columns, correct?

24 A. Yes.

25 Q. And there's two columns that are listed

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1 Deposits and Payments, correct?

2 A. Correct.

3 Q. Okay. Now, if you turn to the next page, which
4 is 1172, if you go all the way down to the July 6, 2007
5 transaction.

6 A. July?

7 Q. July 6, 2007 transaction.

8 A. Okay. Yes.

9 Q. And if you look at the very last column on the
10 very right, you see an amount of REDACTED listed,
11 correct?

12 A. Correct.

13 Q. And this is listed in the payments column,
14 correct?

15 A. Correct.

16 Q. And payments are withdrawals from the account,
17 correct?

18 A. Correct.

19 Q. So you would agree that on July 6th, 2007, a
20 REDACTED withdrawal was made from your flex CD account,
21 correct?

22 A. That's what it says here, but I don't remember.

23 Q. But you would agree, the document shows a
24 transaction on REDACTED as a withdrawal on July 6, 2007,
25 correct?

1 A. Yes.

2 Q. And if you go a little bit farther down to
3 August 7, 2008.

4 A. Yes.

5 Q. On the very right hand, again, the last column
6 on the right, it lists an amount of REDACTED, correct?

7 A. Correct.

8 Q. And this amount of REDACTED is listed in the
9 payments column, correct?

10 A. Correct.

11 Q. So this REDACTED was also another withdrawal
12 from a flex account, correct?

13 A. Correct.

14 Q. So going back to the REDACTED withdrawal, do you
15 know who this withdrawal was made for?

16 A. I don't recall, but I think it was to go from
17 one account to the other account.

18 Q. Do you recall which accounts it was going
19 between?

20 A. No. No.

21 Q. But you would agree, this would have been a
22 withdrawal from your Stanford account to another bank
23 account, correct?

24 A. To another Stanford account, the REDACTED.

25 Q. So you think it might be to another Stanford

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1 account?

2 A. Yes. Another CD.

3 Q. Okay. If you turn back to the prior page,
4 1171, you'll see this is for [REDACTED],
5 correct?

6 This is the exchange account we were
7 talking about earlier?

8 A. This one.

9 Q. Right.

10 A. Uh-huh. Yes.

11 Q. Do you see any amounts of [REDACTED] being
12 deposited into this account on the date of July 6, 2007?

13 A. No.

14 Q. And you don't see any amounts of [REDACTED] being
15 deposited into this account after July 6, 2007, correct?

16 A. Correct.

17 Q. And then if you go back to the Page 1172 and
18 you look at the very bottom, it lists [REDACTED]

19 [REDACTED], correct?

20 A. Correct.

21 Q. And you previously testified, this is your
22 account for your fixed CD, correct?

23 A. Correct.

24 Q. And if you look to the transaction detail
25 underneath this account, again, you don't see any

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1 deposits into this account for REDACTED on July 6th,
2 2007, correct?

3 A. Correct.

4 Q. And if you turn to the next page, you don't see
5 any deposits into this account for REDACTED, into this
6 account at any point, correct?

7 A. Correct.

8 Q. And so for the -- would you agree, then, that
9 these are the three accounts, correct, that you had with
10 Stanford?

11 A. Yes.

12 Q. And so none of these show a deposit of REDACTED
13 [REDACTED], correct?

14 A. Correct.

15 Q. So would you agree that the REDACTED was a
16 transfer from your Stanford account to another
17 non-Stanford account?

18 A. If that says here, it have to be that way.

19 Q. And then for the REDACTED withdrawal, do you
20 know what this withdrawal was for on August 7th, 2008?

21 A. That amount was the one that we were talking
22 before.

23 Q. And was this the amount we were discussing in
24 regards to sending money to Juan, your husband?

25 A. Exactly.

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1 Q. (By Ms. Sivashanker) Ms. Suarez, I'm going to
2 hand you what's been marked now as Exhibit 154, and this
3 is a document titled Certification Form. The Bates
4 numbering is STANFORD_TDBANK000366 to
5 STANFORD_TDBANK000367.

6 Ms. Suarez, do you recognize this
7 document?

8 A. I don't -- I don't -- I don't remember, but
9 like I said before many, many times, I don't remember a
10 lot of these documents.

11 Q. And if you go to the last page of the document,
12 you will see that there are four signatures there.

13 Do you see your printed name, Diana
14 Suarez?

15 A. Yes.

16 Q. Did you sign this document?

17 A. Yes.

18 Q. And if you turn back to the first page, you
19 will see in the first line numbered 1, it says: Please
20 fill in all the following bubbles that apply to you. I
21 have not applied for, asserted a claim for or received
22 compensation for any part of my total claim amount from
23 any source other than the receivership.

24 Do you see that language?

25 A. Yes.

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1 Q. And you see that this language was selected on
2 the form as the option being selected, correct?

3 A. Yes.

4 Q. And you previously testified that you did
5 submit a claim to the joint liquidators, correct?

6 A. Yes.

7 Q. Do you know why you didn't indicate that on
8 this form?

9 A. I don't know. No.

10 Q. And do you agree that that information should
11 have been listed on the form?

12 A. Let me read them again.

13 (Witness perusing document.)

14 Well, I don't know what to say about it
15 because, like I said before many times, my son was the
16 one who was doing this and he just say, you know, sign
17 here and I did.

18 Q. So you think that your son filled the form out
19 incorrectly?

20 A. Maybe.

21 (Exhibit 155 was marked.)

22 Q. (By Ms. Sivashanker) Ms. Suarez, I'm going to
23 hand you what's been marked as Exhibit 155. This is a
24 Spanish language e-mail with English attachments behind
25 it. Behind that is an English translation of the

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1 Do you recall that?

2 A. Yes.

3 Q. Okay. And there were some questions about your
4 2007 tax return.

5 A. Yes.

6 Q. First of all, did you file tax returns in the
7 US in 2006, 2007 and 2008?

8 A. Yes, I did.

9 Q. Okay.

10 A. Jointly with my husband.

11 Q. And when you testified that the 2007 tax return
12 didn't -- didn't include the interest that you received
13 from your CDs, you're referring to a tax return in the
14 United States --

15 A. Yes.

16 Q. -- is that correct?

17 Now, you would agree with me that if you
18 didn't pay taxes that were due, that would be wrong?

19 A. Exactly.

20 Q. And you mentioned that there is an accounting
21 firm, you don't remember the name, that you believed
22 didn't declare the -- these interest payments in 2007.

23 A. Yes.

24 Q. You recall that?

25 Do you have information at your house that

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1 me and say: Don't buy that stuff because it's too
2 expensive, things like that. I didn't want that.

3 MR. HAMPTON: That's all the questions I
4 have. I appreciate your time today.

5 THE WITNESS: Okay. Thank you.

6 MR. HAMPTON: Are you not going to tell me
7 that you enjoyed meeting me?

8 THE WITNESS: You are a very nice guy.
9 Okay.

10 MR. SWANSON: Yeah.

11 EXAMINATION

12 BY MR. BRINKMAN:

13 Q. Good afternoon, Ms. Suarez. My name is Taylor
14 Brinkman and I represent HSBC. I'll be brief.

15 You testified earlier that you have given
16 your son, Gabriel, a power of attorney to act on your
17 behalf in all matters relating to Stanford, correct?

18 A. Yes. Not only Stanford, everything.

19 Q. Does that power of attorney also give Gabriel
20 the ability to act on your behalf in this litigation?

21 A. I would say yes, in everything.

22 Q. And so Gabriel can make decisions for you with
23 respect to this litigation, correct?

24 A. Correct.

25 Q. Do you have authority to make decisions with